

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STEPHEN M. WILSON, *et al.*,

Plaintiffs,

v.

IMAGESAT INTERNATIONAL  
N.V., *et al.*,

Defendants.

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Docket No. 07 Civ. 6176 (LTS)

DECLARATION OF  
JOSEPH ACKERMAN

1. I, the undersigned, Joseph Ackerman, am over eighteen (18) years of age, have my full mental faculty and am competent to make this Declaration. The facts set forth in this Declaration are within my personal knowledge and are true and correct.

2. I am a citizen of the State of Israel, where I now live.

3. I have never attended a meeting in the State of New York of the Board of Directors of ImageSat International, N. V. ("ImageSat"), and I have never traveled to, or been present in, the State of New York in connection with any of the business activities made the subject of the above-styled action. Furthermore, I have never met in the State of New York with any of the Plaintiffs in this action.

4. Since 2000, my only business travels to the State of New York have been on behalf of Elbit Systems Ltd., principally in order to confer with various financial analysts and investors in Elbit Systems Ltd., and such travels have occurred approximately once or twice per year. None of these trips related in any way to any of the Plaintiffs in the above-styled action.

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5. Any other travels to the State of New York have been of a personal, leisure nature, and included one trip in 2000 to a location I recall as the "Finger Lakes," and occasional visits to a friend's home on Long Island.

6. To the best of my knowledge, I was a member of the Board of Directors of ImageSat International N. V. ("ImageSat") from on or around September 5, 2002 until on or around February 15, 2005, but as set forth above, never traveled to New York in connection with the activities or meetings of this Board. To the extent I possess any record, document, and/or thing that could possibly relate to the activities of the Board of Directors of Defendant ImageSat, such things would be located in the State of Israel. No such records, to the extent any exist, would be located in the State of New York.

7. I do not now own, nor have I ever directly or indirectly owned, property or rented or had an office or a residence in the State of New York.

8. I do not now have, nor have I ever had, an agent or employee who handles or has handled any business on my behalf in the State of New York.

9. Several years ago, I owned a bank account for approximately one year with a bank located in the State of New York. I do not now own, nor have I previously owned (other than the brief period mentioned above), any other bank accounts in the State of New York.

10. I do not now have, nor have I ever had, a driver's license or been registered to vote or had any other type of license issued by the State of New York.

11. I have never advertised or distributed any publication in the State of New York, nor been broadcast on any program in the State of New York.



12. I do not now own, nor have I ever owned, an automobile or any vehicle licensed or registered by the State of New York.

13. I do not now have, nor have I ever had, a post office box, telephone number or any automatic answering service in the State of New York.

14. I do not hold any professional license granted by the State of New York.

15. With the exception of the current proceeding, I have never been named as a party to any other lawsuit or administrative proceeding in the State of New York.

16. Apart from the trips set forth above, I have not made any personal or business trips to the State of New York.

17. Defending myself against the claims set forth in the Original Complaint in the State of New York instead of in my home country of Israel will inflict an unforeseen and significant toll on me as I would be required to travel to New York and participate in an unfamiliar, foreign, time-consuming and expensive legal process in English, which is not my primary language.

18. Because I am resident within the State of Israel, I would submit to the jurisdiction of the courts within my home country. I have never consented to jurisdiction in the State of New York.

I declare under the penalty of perjury that the foregoing is true and correct.

This 11 Day of October, 2007.

  
JOSEPH ACKERMAN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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v.

IMAGESAT INTERNATIONAL  
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JOSEPH ACKERMAN